

North American Numbering Council

Meeting Minutes

December 16-17, 1998

I. Time, Date and Place of Meeting: The North American Numbering Council held a meeting, commencing at 8:30 a.m., at the Federal Communications Commission, 1919 M Street, NW, Washington, DC.

II. List of Attendees:

A. Council Members

Voting Members

	<u>Organization</u>
1. Emily Williams	ALTS
2. David Konczal	American Mobile Satellite
3. Edmund Gould	AT&T Corp.
4. Dan Hochvert/ Wayne Chiles	Bell Atlantic
5. Paul Kenefick	Cable & Wireless, Inc.
6. Ronald Binz	Competition Policy Institute
7. Carol Anne Bischoff	CompTel
8. Lori Messing	CTIA
9. Alan Hasselwander	Frontier
10. Bernard Harris	GTE
11. Peter Guggina	MCI WorldCom
12. Vincent Majkowski	NARUC
13. JoAnne Sanford/Erin Duffy	NARUC
14. Beth O'Donnell	NCTA
15. Larry Krevor	Nextel Communications, Inc.
16. Dan Gonzalez	NEXTLINK
17. Joe Kingrey	NorTel Networks
18. Jerry O'Brien	Omnipoint
19. Trent Boaldin	OPASTCO
20. Cathy Handley	PCIA
21. Bill Adair	SBC Communications, Inc.
22. Jonathon Chambers	Sprint Corp
23. Gerry Rosenblatt	TIA
24. Paul Hart/Tony Pupek	USTA

Special Members (non-voting):

John Manning	ATIS
Ron Connors	NANPA

B. Commission Employees

Kris Monteith, Designated Federal Official
Les Selzer, Network Services Division (NSD), CCB
Patrick Forster, NSD, CCB
Jared Carlson, NSD, CCB
Jeannie Grimes, NSD, CCB

III. Estimated Public Attendance: Approximately 37 members of the public attended the meeting as observers.

IV. Documents Introduced. Each member received the following handouts:

- (1) LNPA Working Group Report
- (2) Recommendation Regarding the Study of Porting Intervals When Porting from Wireline to Wireless [Presented to the LNPA Working Group December, 1998]
- (3) Wireless Number Portability Subcommittee Report
- (4) INC Report - Issue 105 Number Pooling and Issue 154, 500-900 Portability
- (5) Referral from INC LNPA Workshop Regarding Type 1 Facilities Based Wireless Providers
- (6) INC Draft Thousand Block (NXX-X) Pooling Administration Guidelines, Rev. December 11, 1998
- (7) NPA Code Relief Planning & Notification Guidelines, INC 97-0404-016, Rev. 10/27/98
- (8) NPA Allocation Plan and Assignment Guidelines, INC 96-0308-011, Rev. 10/27/98
- (9) MCI Contribution Regarding Reserved Numbers
- (10) Reserved Numbers Points of Agreement and Disagreement
- (11) Request from NANPA Oversight Working Group (NOWG) for Guidance from the North American Numbering Council (NANC) on the "Appropriate Bid Approach to be Included" in the 1000 Block Pooling Administrator Guidelines
- (12) NANPA Oversight Working Group Report
- (13) State Specific Request for NANPA Performance
- (14) Statement of Mitretek Systems to the NANC
- (15) Statement Regarding Consumer Preference Information, Submitted by Ron Havens, Sprint
- (16) Steering Group (SG) Contribution Regarding Use of NANC Mentors
- (17) Steering Group Report and Steering Group November Meeting Notes

V. Summary of the Meeting:

A. Welcoming Remarks. Alan Hasselwander, Chairman of the Council, provided welcoming remarks.

B. Approval of Minutes of November Meeting. The minutes of the November Meeting of the NANC were approved without modification.

C. Local Number Portability Administration (LNPA) Working Group Report. Co-Chairs, Tom Sweeney and Paula Jordan, provided the report to the Council on the status of the activities of the Wireless Subcommittee (WSC); Number Pooling Subcommittee (NPSC); the NPAC Release 2.0, and the "Slow Horse" issue.

Paula Jordan, AirTouch, reported on the activities of the WSC. Ms. Jordan reported that the WSC last met on Monday, December 7, and reviewed the reseller issue, NANC 204 Priority/LSR Process Improvement, NPAC performance, and intercarrier testing. Ms. Jordan reviewed the

key issues associated with those issues, as detailed in the handout provided to NANC members. Ms. Jordan also reported that the action items for the January meeting of the WSC include: to determine the position on the proposal to allow resellers to interface directly with the NPAC; to review the benefits and risks/cost associated with NANC 204 and other LSR improvement alternatives, as developed by the new subgroup created to work on this issue; to develop a wireless model to determine wireless busy hour porting transaction requirements over the next 5 years; and wireless testing requirements, including a time line to identify the scope (quantity) of wireless carriers and time frames for turn up, regression (Release 2 & 3) and intercarrier testing. Ms. Jordan also reported that the WSC had sent letters to PCIA and CTIA in an effort to determine the number of wireless carriers operating in the 100 MSAs.

Bernie Harris, GTE, stated that only carriers in the top 100 MSAs would have to implement interface with the NPAC for testing. Lori Messing, CTIA, stated that because some wireless carriers in the top 100 MSAs (A through F Block carriers) have returned their spectrum, the process of obtaining an accurate count of the number of carriers operating in the top 100 MSAs is complicated.

Ms. Jordan next reported that the Wireline Wireless Integration Subcommittee's (WWISC) last meeting was held in December. The work of that subcommittee will be folded into the work of the LNPA WG, effective January 1999. Ms. Jordan also reported that the LNPA WG further report on wireline/wireless integration will be delivered by the June 1999 NANC meeting. The LNPA WG will provide status reports in the interim.

Chairman Hasselwander questioned whether companies would have an opportunity to review the LNPA SC report in advance of June 1999. Ms. Jordan stated that by February 1999 a draft copy of the report will be posted to the FCC web page. Chairman Hasselwander also agreed to post the draft report and ongoing revised reports on his web page at <http://www.frontiernet.net/~ahasselw/COUNCIL>.

In response to a question from Peter Guggina, MCI WorldCom, as to alternatives for reducing the porting intervals when porting from wireline to wireless, Ms. Jordan reported that the high level objectives of the porting intervals are being reviewed; one alternative that is considered in the report is the implementation of a 10-digit trigger, which would require service providers' concurrence. Ron Havens, Sprint, raised a question concerning estimates on porting intervals. Ms. Jordan reported that, currently, the estimated interval is 2 hours for wireline to wireless porting, although Tom Sweeney, AT&T, reported that the estimate may be premature. Ms. Jordan noted that, preliminarily, some carriers cannot meet that porting interval time frame. Ms. Jordan also affirmatively indicated that the NANC would be kept apprised of policy questions that arise in the course of the development of the wireline/wireless integration report.

Tom Sweeney reported on the status of the work of the National Number Pooling Subcommittee. Mr. Sweeney reported that the developments of the requirements is on target for delivery on December 28, 1998, and that the statement of work process is targeted for First Quarter 1999. Mr. Sweeney also noted that the test cases development is targeted for First Quarter 1999, as is the integration of Release 2.0 (correction from the December report). Finally, Mr. Sweeney noted that many service providers had expressed concern that the target implementation date of December 1999 is coincident with the Year 2000 (Y2K) event.

Guidance regarding implementation of number pooling and an implementation date will come from the FCC, however. Paul Hart, USTA, noted that many companies will be taking a hiatus from further network upgrades, beginning in September 1999 and continuing until Y2K implementation has been completed.

Mr. Sweeney next reviewed the "Slow Horse Status." Mr. Sweeney reported that the LNPA WG had asked Lockheed Martin with collecting LSMS system availability data (that is, the percentage of scheduled operating hours each service provider is associated and running). Mr. Sweeney also reported on the formation of a subcommittee to identify data needed for the "slow horse" analysis and that the next step is to develop "slow horse" identification criteria, including minimum LSMS interface performance requirements, performance thresholds, and data collection/reporting processes. Mr. Sweeney stated that work on long-term solutions to "slow horse" problems will begin in January, as previously scheduled.

Ed Gould, AT&T, commented that when the process began, interaction with the NPAC was not a network issue. Mr. Gould raised the question of where the authority over this issue lies, noting that slow implementation has potential policy implications that NANC may have to address. Peter Guggina, MCI WorldCom, raised a question concerning the current status of LNP billing and collection. Mr. Sweeney indicated that this issue has not been addressed. He also indicated that he did not believe the issue was within the LNPA WG's scope of work; rather, it is a matter to be addressed by the LLCs and the vendor.

Finally, Mr. Sweeney reported that the next LNPA WG meeting will be held from January 11-14, 1999, in Atlanta, Georgia.

D. Industry Numbering Committee (INC) Report. Cathy Handley, PCIA, and Richard Round, GTE, presented the INC report. Initially, Ms. Handley announced to the NANC that, effective in January, 1999, Richard Round would become the INC moderator, and that Shawn Murphy, AT&T, would become the assistant INC moderator. Ms. Handley then directed the NANC's attention to the overview of INC activities and issues contained in the INC Report. Ms. Handley also directed the NANC's attention to the list of contributions contained in the INC Report, which were received in connection with the December INC LNPA Workshop meeting. Ms. Handley noted that the INC had made modifications throughout the existing INC Guidelines, that all NANC members should have received a copy of the revised INC Guidelines, and that they are available on the INC web site at <http://www/atis.org/atis/clc/incdocs.htm>.

Ms. Handley advised the NANC that the INC Guidelines, for all practical purposes, have been completed. Ms. Handley also explained that the portions of the Guidelines which are marked "draft" are drafts for the purposes of the rules that the INC follows, and that these portions are expected to be finalized at the January INC meeting. As noted in the INC Report, Ms. Handley reiterated that the Glossary of Terms had been updated, and that the application and other forms also had been finalized. Ms. Handley also directed the NANC members' attention to the Summary of Agreements Reached contained in the INC Report.

Trent Boaldin, OPASTCO, questioned whether the bullet point on page 5 of the INC Report, concerning the submission of CO Code utilization and forecast reports, meant that carriers operating in a non-pooling area would be required to submit reports every 6 to 9 months. Ms.

Handley clarified that this bullet point meant that if a carrier was going to begin pooling, that the CO Code utilization and forecast reports should be submitted 6 to 9 months prior to the initiation of pooling. Ed Gould, AT&T, questioned whether the last bullet on page 5 of the INC Report, concerning the population of telephone numbers in LNP databases for number blocks allocated to service providers, meant that even though there may not be a need to pool all the numbers, that they would be pooled regardless of the need, and that carriers would insert their own LRNs. Mr. Gould questioned whether carriers assigned an NXX code in the LERG, while theoretically not required to port numbers out of a block, would do so just to be consistent. Ms. Handley explained that this bullet applied only to blocks of numbers which the LERG assignee had donated to another carrier, but had later been returned to the LERG assignee.

Ms. Handley clarified for Chairman Hasselwander that page 6 of the INC Report contains a summary of the modifications necessary to bring the CO Code Assignment Guidelines into agreement with the NPA Allocation and Assignment Guidelines and the NPA Relief Planning and Notification Guidelines. Ms. Handley noted that page 6 also lists items to be completed. With respect to the bullet on page 6 of the INC Report concerning the submission of semi-annual forecast and utilization reports, Trent Boaldin, OPASTCO, questioned why a carrier in a rural area not needing an NXX code for the next ten years should be required to submit these reports semi-annually. Richard Round replied that, while it may seem unreasonable to submit semi-annual reports for some carriers, the INC had decided that semi-annual reports were necessary, and that, for consistency purposes, all carriers should submit reports. Mr. Boaldin then stated that he thought that in previous discussions of the LINUS, which is a similar type of report, the differences in the usage and the need for numbers would be recognized. Further, Mr. Boaldin indicated that he understood that the resulting reporting requirements would account for these differences. Ms. Handley replied that ultimately different carrier reporting requirements, based on different usage and need requirements, may be adopted. Ms. Handley stated, however, that no opposition to the semi-annual submission requirement had been expressed. She also reiterated Mr. Round's point, namely that a reporting requirement applicable to all carriers had been chosen for consistency purposes. Ms. Handley also stated that, because numbering usage conditions for a rural carrier could change rapidly, it is important to gauge number usage at regular intervals, particularly in light of ongoing number exhaust issues.

Chairman Hasselwander mentioned that this issue had been discussed in the last NANC meeting, and that NANC members would have an additional opportunity to address this issue, and possibly amend the plan, when the NRO Working Group presented its work plan. Dan Hochvert, Bell Atlantic, then suggested that a company could state, in its initial report, that the NANPA should consider every report due for subsequent six month intervals the same as its initial report, until otherwise notified. Jerry O'Brien, Omnipoint, concurred, and suggested that a carrier could even submit the same report at the required interval. Ms. Handley then stressed that the goal is to revise the CO Code and Thousands Block Pooling Assignment Guidelines so that they are consistent with one another, and that the CO Code Assignment Guidelines had been modified to reflect the six month usage and forecast reporting intervals contained in the Thousands Block Pooling Assignment Guidelines. Chairman Hasselwander noted that this issue had been discussed at last month's meeting, and that the specifics of the reporting intervals would be handled by the NRO in an appropriate manner.

Continuing with the report, Ms. Handley encouraged NANC members to visit the ATIS web site (<http://www.atis.org/atis/clc/inc/incwdocs.htm>) and review the INC Guidelines documents listed on page 7 of the INC Report. Chairman Hasselwander then reminded the NANC that the INC had been directed by the NANC, some time ago, to review all of the procedures listed on page 7 of the INC Report. Chairman Hasselwander stated that these documents were in the final stages; NANC members should visit the ATIS web site and become familiar with the documents, if they had not done so already. Bernie Harris, GTE, stated that he understood that some sections of the documents are incomplete, such as the auditing section, and questioned the status of those incomplete sections if the INC approves the documents in January, 1999, as planned. Richard Round replied that only the Thousands Block Pooling Administration Guidelines were affected by the absence of the auditing section, which will be inserted in Section 12. Mr. Round stated that this section had been left blank pending receipt of the NANC work on auditing. Mr. Round indicated that the Thousands Block Pooling Administration Guidelines would be updated once that work is received.

Continuing with the report, Ms. Handley noted that the INC Work Plan, listed on page 8 of the INC Report, had not changed except that the first two items have been completed.

Moving to the 500/900 Number Portability Workshop portion of the INC Report, Chairman Hasselwander noted that at the last NANC meeting, the INC was asked by the NANC to develop a work plan that would maximize participation in addressing 500/900 Number Portability. Ms. Handley then reviewed the work accomplished to date on this issue, as noted on page 9 of the INC Report. She noted that the INC had agreed to complete its work and sent a response to the NANC no later than August 20, 1999. Chairman Hasselwander stated that the effective date of the Commission's Order is January 11, 1999. Therefore, NANC's response to the Commission is not due until January 10, 2000. Chairman Hasselwander noted that the planned August 20, 1999, date for the INC's delivery of a response to the NANC concerning this issue, would leave approximately four months for the NANC to complete a response regarding 500/900 Portability for submission to the Commission. Following a short discussion on the time-frame necessary for completion of the INC report on 500/900 Number Portability, Chairman Hasselwander proposed, and the NANC agreed to, a revised submission date of October 1, 1999, rather than August 20, 1999.

Continuing with the report, Ms. Handley directed the NANC's attention to page 10 of the INC Report, which detailed the 500/900 Number Portability Workshop Work Plan. Ms. Handley noted that the current outline for the INC's report on 500/900 Number Portability is very similar to the previous report on this issue. A short discussion ensued about the financial feasibility of 500/900 number portability, and the NANC agreed that technical feasibility must be determined before financial feasibility. Jerry O'Brien, Omnipoint, questioned whether wireless carriers who use 500/900 numbers would be included in the report. Ms. Handley replied in the affirmative. Ms. Handley then directed the NANC's attention to page 11 of the INC Report, which addresses participation in the INC 500/900 Number Portability Workshop.

Peter Guggina, MCI WorldCom, questioned whether a mechanism had been established to allow individuals that could not attend not in person to send contributions. Ms. Handley affirmed that a mechanism had been proposed, as noted in subsequent bullets on page 11 of the INC Report. Ms. Handley also advised the NANC that the INC meeting host would be responsible for

arranging a suitable conference bridge, but that the conference bridge would be discontinued if it did not work properly (e.g., because of acoustical problems). Alternatives for maximizing participation absent a conference bridge, such as varied locations for the meetings, were discussed. Peter Guggina, MCI WorldCom, suggested that NANC members utilize the ATIS web site to monitor INC progress and submit contributions electronically. Ms. Handley affirmed that contributions from all participants would be considered, regardless of the form of submission. Chairman Hasselwander then requested that the NANC be apprised monthly of the functioning of the conference bridge and any associated problems. Ms. Handley and Mr. Round, in response to a question from Jerry O'Brien, Omnipoint, clarified that the INC meetings were industry meetings sponsored by the ATIS, and were open to the public. Dan Hochvert, Bell Atlantic, suggested that electronic contributions to the INC may be more effective than participating via conference bridge. Trent Boaldin, OPASTCO, questioned whether meeting agendas could be scheduled to allow participants to attend only a part of the meeting. Ms. Handley replied affirmatively. Ms. Handley pointed to the ATIS web site as a reference for meeting locations and general agendas. She noted, however, that more specific agenda items may be added on the first day of a meeting.

Ms. Handley again encouraged participation by NANC members. Moving to page 12 of the INC Report, she reiterated that much interaction with other groups would take place in the preparation of the INC's 500/900 Number Portability Report. The INC will provide monthly updates of its progress. Chairman Hasselwander asked whether a letter was needed from the NANC noting acceptance of the INC Work Plan and the change in the 500/900 Number Portability Report submission date from August 20, 1999 to October 1, 1999. Ms. Handley replied that such a letter would be appropriately informative. Chairman Hasselwander agreed to send a letter.

Ron Havens, Sprint, questioned the inclusion of the OBF in the INC's plans for interaction with other groups. Ms. Handley clarified that INC would coordinate with all appropriate groups, including the OBF, to ensure that all bases are covered; the OBF may not, however, have any contributions to make on this issue. Ms. Handley then directed the NANC's attention to page 13 of the INC Report which sets forth the logistics for the next couple of INC meetings and a conference call. Lastly, Ms. Handley directed the NANC's attention to the sample CO Code Utilization/Forecast Report attached to the INC Report.

Chairman Hasselwander then initiated a discussion on a referral from the INC LNPA Workshop, and directed the NANC members' attention to a memorandum he had prepared on the issue. Specifically, the question referred to the NANC was whether a LEC with whom a Type 1 facilities based wireless serve provider is interconnected can deny the assignment of additional numbers if directed by the code administrator, if the Type 1 facilities based wireless service provider does not provide utilization information to the CO code administrator. Further, if assignment of additional numbers can be denied, the INC LNPA workshop question how the denial would be enforced. In his memorandum, Chairman Hasselwander referenced earlier NANC discussions concerning COCUS/LINUS, during which the NANC had agreed that the NANPA should make the initial determination on the decision to withhold numbers. Chairman Hasselwander suggested that that decision could be applicable to the code holder, a reseller, a Type 1 wireless facilities-based wireless carrier or some combination thereof.

A discussion ensued. Jerry O'Brien, Omnipoint, remarked that all Type 1 connections are PSAPS and questioned whether LECs would give information on PSAPs. He also suggested that trunking requirements ought to be included in utilization data collections. Peter Guggina, MCI WorldCom, indicated that the NANC had agreed that the code holder would be responsible for reporting data. He also indicated that, in his view, a reseller is a reseller and questioned the issue under consideration. Dan Hochvert, Bell Atlantic agreed, assuming the Type 1 facilities are defined as "reseller." Paul Hart, USTA, agreed that the focus should be on the code holder, who has the obligation to report data. Peter Guggina reiterated that a Type 1 code assignment relationship is similar to a reseller relationship and, for this reason, it ought to be treated in the same manner. Bernie Harris, GTE, suggested that the relationship is not identical and that generalizations should not be made. Chairman Hasselwander suggested that the NANPA could "reach through" and that the secondary carrier could be responsible to the FCC. Paul Hart, USTA, questioned whether the LEC assigns numbers to its customers out of an NXX that also is used by wireless carriers. Paula Jordan replied affirmatively. Jerry O'Brien, Omnipoint, and Trent Boaldin, OPASTCO, suggested that the code holder should be responsible for reporting data. Bill Adair, SBC, agreed stating that the NANPA should not get involved in the business relationship between the LEC and the reseller.

Following the discussion, Chairman Hasselwander asked the NANC members whether any opposed responding negatively to the INC; that is, that the LEC cannot deny the assignment of additional numbers to the service provider. Hearing no opposition, Chairman Hasselwander stated that he would so respond to the INC.

E. Number Resource Optimization (NRO) Working Group Report. Beth O'Donnell, Co-Chair, provided the report to the Council. The handout included a workplan for the revised COCUS/LINUS data collection model. The NRO WG requested clarification from NANC on the NANC letter to the NANPA WG of March 1998, which had an original deliverable of the COCUS/LINUS data collection model by May 1998. Ms. O'Donnell noted, however, that the May 1998 date had been set aside because of the subsequent assignment by the Chief, Common Carrier Bureau, that the NRO WG produce the number pooling and optimization report by September 23, 1998.

Chairman Hasselwander suggested to the Council that first a date should be determined for delivery of a higher level document in enough detail to determine utility and cost, and then go ahead with step two, the preparation of a document that is implementable by the NANPA and the industry. Paul Hart, USTA, asked whether it would be appropriate to revisit the drivers behind this initiative and the desired end points.

Chairman Hasselwander stated that the present COCUS is not very useful for any purpose. He also noted that the NANC has previously discussed the failure of service providers to provide data and that, without question, the state regulators need a single source for such data. Chairman Hasselwander remarked that, at present, the industry is operating in the dark, without critical facts. He reiterated that the collection of useful data is a very important objective, and must be addressed sooner rather than later.

Dan Hochvert, Bell Atlantic, added that the NANC should back up even further and discuss what it need in terms of data. He noted that the COCUS was originally designed to project NPA

exhaust; forecasting utilization is very different. Mr. Hochvert noted that the Lockheed Martin LINUS model is a usage collection mechanism which requires a centralized data base of usage. He does not see the need for such a model. Instead, audits could be used to verify data.

Chairman Hasselwander questioned whether Mr. Hochvert's position was that the model used should only be a forecasting tool, and not include utilization data. Mr. Hochvert explained that he believes that forecasting and utilization collections should be distinguished. He also stated that he believes there is no need to maintain a database with utilization data; instead, utilization data should be collected as needed.

Chairman Hasselwander opened the discussion on whether forecasting data should be collected on a regular basis and utilization data collected as needed. Peter Guggina, MCI WorldCom, supported the collection of both. Cathy Handley, PCIA, stated that a strong separation should exist between the two (utilization and forecasting). Bill Adair, SBC, added that in his experience, COCUS data is a problem and that he has not received one forecast report in four years. He indicated that industry needs a forecasting tool.

Elsa Morris, Ohio PUC, stated that Ohio spent over 500 hours looking at data reported because there was no set standard regarding definitions. Ms. Morris added that she does not believe that the industry and regulators need two reports, but rather should look at the existing report before spending money and time on a new model. Ms. Morris indicated that state regulators need both forecast data and utilization data on a regular basis; nonetheless, industry should not spend the money on a model as sophisticated as LINUS, unless it is needed.

Dan Hochvert, Bell Atlantic, reiterated that his objections to the collection of utilization data is with the creation of a centralized data base which maintains all lines in service. Mr. Hochvert indicated that he believes that information on the number of NXXs in service, with percent of utilization, gets at problem with a neutral NANPA in place.

Bernie Harris, GTE, noted that the industry must first determine the purpose of the data that will be collected. The frequency of collection should be based on the intended usage; and, in high growth areas, the collection of data every three months would probably be sufficient. Mr. Harris also indicated that forecast data is only as good as the persons forecasting. Ron Conners, Lockheed Martin, stated that, in Lockheed Martin's view, utilization data is critical. Chairman Hasselwander stated that the NANC had determined that a failure to provide data would subject the code holder to a penalty, namely, the withholding of the additional resources. Chairman Hasselwander stated that the NANC members appear to be questioning how and how detailed the collection of utilization is, that is, whether it should be collection on a percentage basis and how frequently it should be collected. Paul Hart, USTA, added that what NANC needs to thoroughly understand the relationship between the utilization and forecasting data and what the data represents. Ron Conners, Lockheed Martin, stated that the most frequently express complaint to Lockheed Martin is with the lack of management by NANPA of the supply of numbers. Mr. Conners stated that utilization data is needed in order to monitor and measure the management of numbers. He further indicated that the NANPA must be able to correlate and calibrate data; he highly encourages the collection of utilization data.

Chairman Hasselwander questioned at what level the data should be collected -- at the NXX level or at the NPA level. He also posed the question of whether the data should be stored and questions on the frequency of collection and the detail that should be required. Ed Gould, AT&T, commented that AT&T is not against collection; however, he noted that he believes more information is needed on what is proposed and an estimate of the costs.

Brian Baldwin, Ameritech, stated that the NRO WG had identified the need in its workplan and the short comings with the current COCUS. Chairman Hasselwander suggested a two step approach. First, the NRO WG would decide the details at a high level; second, following approval by the NANC of the high level details, the NRO WG would provide an implementation level report. Dan Hochvert, Bell Atlantic, agreed that a high level plan should be the first step. He suggested that the NRO WG should come back to discuss the steps at the January NANC meeting.

Peter Guggina, MCI WorldCom, agreed that the industry should set common goals on which it agrees. He acknowledged that currently forecasting data is not accurate and utilization data is empirical. Trent Boaldin, OPASTCO stated his opposition to reporting any utilization data.

Paul Hart, USTA, questioned the relationship between forecasting and utilization data, who reports the data and so forth. Dan Hochvert, Bell Atlantic, offered that this really a three part process -- the reporting of utilization data, the reporting of forecast data, and the request for additional resources. Mr. Hochvert stated that the NANPA must tie together the request for data and the reporting of data. Bill Adair, SBC, that utilization data must be reported; customers, regulators, and the press need utilization data to understand why a need code is needed. Chairman Hasselwander noted that utilization data will allow for the more effective use of telephone numbers, and having the data available will allow state regulators to make important decision regarding area code relief. Bill Adair, SBC, questioned whether utilization data will solve that problem. Bernie Harris, GTE, questioned the meaning of "effectively" and noted that the data may not be indicative of how effectively numbers are being used.

Vince Majkowski, NARUC, voiced some confusion regarding the discussion. He noted that in May 1997, the NANPA had provided a presentation on LINUS and COCUS. From that, the NRO WG was formed and had developed its report on pooling and conservation measures. Mr. Majkowski stated that he believed that high level agreements had been reached on the need to transition to a more effective utilization of numbers, on confidentiality, the audit process, and enforcement responsibilities. Mr. Majkowski stated that NBANC will need to include the costs of the data collection effort in its contribution factor to pay NANPA for its services. Peter Guggina, MCI WorldCom, stated that NANC should agree in principle on the data collection goals, based on what has been presented by the COCUS/LINUS model, and then look at what needs to be done to reach those goals, as a bridge to the audit process. Ron Havens, Sprint, indicated that the NANC must decide how data should be developed and then inform those in the industry responsible for developing the data. Ed Gould, AT&T, reviewed the four principles previously agreed to by NANC: (1) provide utilization and forecast data and inform service providers on how to report data; (2) the cost of the system will be considered; (3) individual service provider data will be maintained confidential; and, (4) auditing will be a part of the process.

Chairman Hasselwander stated that NANC has agreed on the basics and it should now let the NRO WG work the details. Chairman Hasselwander indicated NANC consensus on collection of utilization and forecasting data and that cost would be a consideration. Chairman Hasselwander further stated that the NANC needs information on the product/model sufficient to react to a cost estimate and that the NANC had agreed that the end product would be implementable. From a process point of view, Chairman Hasselwander stated that, at each NANC meeting, NANC should get an update from the NRO WG on any issues or disagreements as they arise.

Vince Majkowski, NARUC, stated that the NRO WG needs to be sensitive to comments that have been submitted in response to the NRO Report. Chairman Hasselwander again stated that the NRO WG must bring issues to the NANC each month as they develop. Ed Gould, AT&T raised a question concerning the confidentiality of data. Chairman Hasselwander noted that confidentiality already had been agreed to and that the NANC's position had not changed. Peter Guggina, MCI WorldCom, agreed.

Cathy Handley, PCIA, noted that the workplan developed by the NRO WG is extremely aggressive and questioned the level of commitment and resources devoted to the task. Ms. O'Donnell stated that there has been poor representation by the wireless industry; however, a core group of about 20 individuals are active at the NRO WG. That core group does not, however, include representatives from consumer groups or NASUCA, although some representation from NARUC has existed.

Ms. O'Donnell noted that the implementable plan has no date; the April 1999 date is the date for the delivery of the high level plan. In other words, conceptual agreements will be reached and presented to the NANC by April; an implementable plan, including a requirements document, will not be presented by April 1999.

Bernie Harris, GTE, suggested the development of an implementable plan, including a requirements document, by Second Quarter 1999. Chairman Hasselwander asked whether delivery by June 1999 would be possible. Vince Majkowski, NARUC, added that NBANC will have to adjust its contribution fact in light of what is developed by the NRO WG and agreed to by NANC.

Following further discussion, the NANC agreed that the NRO WG should report to it at the NANC's January 1999 meeting as to whether a June 1999 delivery date is doable.

Reservation Process. Ms. O'Donnell reported that the NRO WG had reviewed a strawman proposal provided by Ameritech on the telephone number reservation process and that intervals had been developed for circulation. The intervals include a one year initial reservations period, with a six month extension possible, although the customer must re-apply for the numbers (take affirmative action). Ms. O'Donnell reported that additional six month extensions are possible if customer has activated 20% of its reserved numbers, or if it has made a firm order request; the 20% activation figure rolls forward. Ms. O'Donnell reported that interest group representation is important. She requested that trade associations and NANC members ensure that their constituencies provide input, particularly from wireless carriers and consumer interest groups. Ms. O'Donnell noted that this report is being provided to the NANC for informational purposes only; the NRO WG is not looking for input today on this issue. Finally, Ms. O'Donnell reported

that MCI had provided the facilities for the December NRO meeting and that Ameritech or AT&T will host the NRO WG's upcoming Chicago meeting.

F. Definition of Reserved Telephone Number. Chairman Hasselwander reviewed a consolidated contribution on the definition of reserved telephone numbers, which noted the points of agreement, disagreement and other points. Chairman Hasselwander stated that the NANC needs to recommend the following: (1) whether it believes that the reservation of a number must be in accordance with a "legally enforceable agreement;" (2) if the answer is to number (1) is "yes," the practical form of the agreement (e.g., tariff, letter of intent, etc.); and, (3) if the answer is "no," how the NANC recommends defining or describing a reserved number. Chairman Hasselwander noted that all parties seem to be in agreement that the definition should not act as a barrier to porting and that number reservation cannot become a method of number hoarding. Chairman Hasselwander expressed his hope that the NANC could find a way to reach such a practical result.

Bill Adair, SBC, suggested that the NANC consider the intent of what the industry is trying to accomplish. He suggested that the intent is to document a "legally enforceable written agreement." Regarding tariffs, Mr. Adair suggested that reservation is done for a specific reason -- it is auditable, trackable and definable. SBC believes that if a tariff is used, there is no debate on whether a legally enforceable agreement exists.

Glen Manishin, MCI WorldCom, provided input on the concept of a "legally enforceable written agreement." Mr. Manishin stated that a legally enforceable agreement is an agreement that a court considers enforceable. Mr. Manishin further stated that tariffs are filed pursuant to law and are legally equivalent to a contract. Dan Hochvert, Bell Atlantic, stated that when a customer orders service under a tariff there may not be a written agreement. The customer may place a telephone call order; Mr. Hochvert stated that part of the definition of "legally enforceable written agreement" may not be satisfied by a tariff. Mr. Manishin added that proof of an agreement would need to be made. Mr. Hochvert noted that the electronic record would serve as proof of the agreement.

Paul Hart, USTA, stated that he thought the NANC had determined that it would not attempt to define "legally enforceable written agreement." Instead, he believed that the NANC had determined to develop a set of criteria that would be indicative of a "legally enforceable written agreement." Mr. Manishin noted that an illustrative list would be developed. Mr. Hart asked whether the word "written" would be left out of the definition. Peter Guggina, MCI WorldCom, added that two issues need to be addressed: first, the definition needs to prevent the indiscriminate reservation of numbers; and, second, the process needs to be simple and easy.

JoAnne Sanford, NARUC, questioned the range of practices within the industry for the reservation of numbers. She also asked whether the customer is charged for the reservation of numbers. Beth O'Donnell, NCTA, noted that a small fee is charged to cover the carrier's administrative costs of maintaining the reserved number status in its system. Cathy Handley, PCIA, added that the fee and the practice vary from state to state -- some carriers charge and others do not.

Dan Hochvert, Bell Atlantic, noted that industry wants a uniform approach to the reservation of telephone numbers and that guidelines should be developed. Paul Hart, USTA, stated that there appears to be concern about how to determine a uniform process. He noted that many different ways of reserving telephone numbers exist and questioned whether the NANC should attempt to define a uniform approach of whether it should leave the issue to the determination of individual companies. Trent Boaldin, OPASTCO, indicated that documentation in a carrier's records should be sufficient. He also noted that the process must be simple.

JoAnne Sanford questioned the mutuality of obligation if a customer asks a carrier to reserve telephone numbers; that is, is the carrier obligated to hold them for the customer and is the customer obligated to take the numbers. Chairman Hasselwander provided a brief history on the issue and how the term "legally enforceable written agreement" was adopted by the FCC in one of its orders. Chairman Hasselwander noted that the industry did not want two definitions and did not want to set up an anti-competitive situation. Peter Guggina, MCI WorldCom, noted that in the toll free context, very specific rules exist for reservations and the porting of telephone numbers from one carrier to another. He suggested that the NANC review the rules developed in that context and the conditions attached there. Shawn Murphy, AT&T, added that AT&T wants a simple reservations process, one that would avoid complex litigation and eliminate competitive loopholes in a porting scenario.

Vince Majkowski, NARUC, queried whether a refundable deposit would be a legally written agreement. Mr. Manishin confirmed that a refundable deposit would be the *quid pro quo* for the reservation. Dan Hochvert, Bell Atlantic, responded that a refundable deposit works in certain situations but does not work in all situations. Mr. Hochvert also suggested that ease of ordering should be a part of the test of whether a number has been reserved.

Chairman Hasselwander stated we must define what the process should be for reserved numbers. Chairman Hasselwander also noted that the NANC may need to go back to FCC on this issue. Dan Hochvert, Bell Atlantic, questioned whether industry could work under the legally enforceable written agreement standard. Trent Boaldin, OPASTCO, reminded the NANC of the need to consider small carriers.

Ron Binz, CPI, stated that NANC should set up a fairly airtight description of reserved telephone number to encourage porting but discourage hoarding. Chairman Hasselwander stated that the NRO WG should go back and define the characteristics of a reserved number and in doing so consider the following: the definition should not create a barrier to porting; the size of carriers -- big versus small companies; and the ease of ordering/reserving. The NRO WG should work the issues and report back to the NANC. Following discussion of the four points of agreement indicated in the handout, the NANC reached agreement to send the issue back to the NRO WG for development of criteria that are indicative of reserved telephone number. The issue will be considered by the NANC at its January meeting.

G. NBANC Review. Vincent Majkowski, NARUC, provided the report to the Council. Mr. Majkowski reviewed the current fund balance, the projected receivables, the payments to Lockheed Martin, the payments to NECA, and the significant activities of the NBANC, as reported on the handout provided to NANC members.

Mr. Majkowski then reviewed the question, as detailed on the handout provided to NANC members, of the payment of interest credit to those companies whose annual contribution requirement was in excess of \$1,200 and who had paid their entire 1998 obligation with a single payment in March 1998. Mr. Majkowski reported that because telecommunications service providers have the option of paying their annual contribution in a single payment or on a monthly basis, they should not have an expectation of an interest credit for choosing to pre-pay. He also reviewed the steps that would be necessary to provide for such an interest credit and stated that the NBANC had preliminarily concluded that such an arrangement would significantly increase NECA's administrative costs. Mr. Majkowski indicated that the NBANC Board had not reviewed this question because it does not meet until January. Nonetheless, Peter Guggina, MCI WorldCom, who had posed the question in the first instance indicated that the response was satisfactory and the issue need not be pursued in any greater detail.

H. "Beta System" Discussion. Chairman Hasselwander stated that he had sent an email to Professor Levine regarding his Beta System proposal and that Dr. Levine had responded to the questions in considerable detail. Dr. Levine's responses had been provided to the NANC, and the NANC must now decide what to further action it should take. Chairman Hasselwander suggested that the issue be forwarded to a NANC working group for consideration.

Bernie Harris, GTE, noted that significant amounts of time should not be spent on this issue until feasibility study is completed at T1S1.6. Chairman Hasselwander stated that he had contacted T1S1 before inviting Professor Levine to make a presentation to the NANC, and that T1S1 considered Dr. Levine's proposal as a serious one. Dan Hochvert, Bell Atlantic, added that he was struck by the complexity of the system from a user standpoint and that there must be an appreciation of the complexity the system needs. He also indicated that he could foresee several stumbling blocks to implementation of such a system. He stated that the proposal would not get high priority at Bell Atlantic.

Cathy Handley, PCIA, and Peter Guggina, MCI WorldCom, both expressed the view that the NANC should wait for input from T1S1. Vince Majkowski, NARUC, added that NARUC had seen this presentation and had discussed the proposal. He also suggested coordination with T1S1 and the NANC.

Paul Hart, noted that the INC already has proposals before it to extend the life of the numbering plan, and that the NRO WG is not equipped to handle such work. Joe Kingrey, Nortel, stated that Nortel Networks has looked at this proposal and found that the proposal should be directed to ATIS. Peter Guggina, MCI WorldCom, questioned whether Dr. Levine had sent his proposal to the INC. Ed Gould, AT&T, added that he believed from Dr. Levine's materials and presentation that he wants to license this technology. Mr. Gould noted, that, with the development of the LRN technology by AT&T and Lucent, when integrated into the network the technology became a part of the public domain. Mr. Gould suggested that Dr. Levine might not want to proceed if he was informed of that fact.

Paul Hart, USTA, suggested that Chairman Hasselwander write a letter to Dr. Levine, and that the letter inform Dr. Levine of the practice in the industry regarding licensing. Dan Hochvert, Bell Atlantic, added that referral to other industry fora may give false hope but, on the other hand, the NANC should not discourage individuals from coming forward with ideas. Bernie

Harris, GTE, stated that Dr. Levine had been referred to NANC by T1S1.6 because that committee thought the NANC would be interested in the presentation.

Joe Kingrey, Nortel Networks, asked whether or not parties with network plans or ideas should be directed to come to the NANC. Chairman Hasselwander responded that the NANC does not send out invitations, and that in this case, he will write to Dr. Levine stating that NANC will await the evaluation of T1S1.6 and revisit this issue if appropriate at that point. Chairman Hasselwander indicated that the letter to Dr. Levine would not contain any reference to licensing customs within the industry.

I. Ron Havens Contribution. Ron Havens, Sprint, reviewed a handout that had been provided to NANC members concerning the lack of a publicly accessible written body of information regarding end user preference on which decisions made by either the NANC or the INC are or will be based. Mr. Havens expressed the view that the NANC and the INC would benefit from having the consumer end user information.

Mr. Havens stated that he believes, at times, industry operates in the dark because it does not have information concerning end user preferences. Dan Hochvert, Bell Atlantic, disagreed with that position. Trent Boaldin, OPASTCO, stated that the NANC must keep the end user in mind. To that end, the FCC had tried to establish a cross-representation on the NANC. Chairman Hasselwander stated that this type of information already is available; the question is how to put it in a central place for accessibility purposes. Peter Guggina, MCI WorldCom, raised the issue of who to ensure good, accurate data. John Chambers, Sprint PCS, noted that the idea is to set out a method to gather information on end user preferences on issues that industry frequently debates. He does not view the issue as an overly complicated one.

Ron Binz, CPI, stated that he was aware of one survey on end user preferences that had been conducted by the State of Colorado. He also noted, however, that grounding decisions on end user preferences is not necessarily the way to go because end users do not always know the full costs of their suggestions. Vince Majkowski, NARUC, that the State of Colorado has a web site containing publicly available information.

Following further discussion, the NANC agreed to the following homework assignment: NANC members would identify two or three numbering issues on which greater knowledge of end user preferences would be helpful; NANC members also will attempt identify data that is available now and bring back to NANC for discussion. Chairman Hasselwander will collate the NANC members contributions and send a consolidated contribution to the NANC members for their review in advance of the January NANC meeting.

December 17, 1998.

J. Opening Statement and Announcements. Kris Monteith, FCC, reported on the decision of the FCC released on December 16, 1998, in which the FCC had extended until March 16, 1999, the date on which the petition for forbearance filed by CTIA must be acted upon by the FCC. Ms. Monteith noted that the CTIA forbearance petition seeks forbearance from enforcement of the implementation deadline for wireless service provider local number portability until the five-year buildout period for broadband PCS carriers has expired. Ms. Monteith noted

that the FCC's decision was based, in part, on requests for an extension made in light of the Common Carrier Bureau's request for comment on the NRO Report. The Commission also urged CTIA, wireless carriers, and all other interested parties filing comment to address whether it is appropriate from a legal, policy, or technical standpoint to consider numbering resource optimization concerns in evaluating CTIA's petition, to provide information on current utilization of numbering resources by wireless carriers and offer proposals for wireless carriers to promote efficient use of numbering resources before implementing LNP.

K. Steering Group. Vince Majkowski, NARUC, provided the report to the Council. Mr. Majkowski first addressed the NANC Working Group Operating Principles that had been forwarded to all NANC members by Chairman Hasselwander. Mr. Majkowski reported that the Steering Group had reviewed and accepted the principles by an unanimous vote. Mr. Majkowski read the principles into the record.

The NANC approved the revised principles, with GTE and Omnipoint opposed. Chairman Hasselwander stated that these principles apply to NANC and its working groups and are meant to ensure that each member of the working groups understands and abides by the common principles. Chairman Hasselwander stated that considerable time and effort had been devoted to the development of the principles and that they are very important. He agreed to email the principles to all NANC members and members of the working groups.

Efficiency of Meetings. Mr. Majkowski reported that the Steering Group had considered a contribution from Chairman Hasselwander concerning proposed methods to improve the efficiency of NANC meetings. Chairman Hasselwander indicated that the contribution would be sent electronically to NANC members. The goal is to improve the efficiency of the NANC in an effort to return to a single day meeting. Each section of Chairman Hasselwander's contribution was read into the record and reviewed.

With respect to the responsibilities of the Chair, Chairman Hasselwander indicated that a preliminary agenda for the NANC should be incorporated into the Public Notice of the upcoming NANC meeting with a refined agenda to be circulated within week before the meeting. Position papers should be provided in advance of meeting. Issues should be defined and an issue manager (NANC member) should be appointed, noting points agreed on and points on which no agreement has been reached. Contentious issues should be scheduled for more than one meeting, if possible. Between meetings, the Chair should encourage parties to try to get together off line to narrow their differences, in an effort to move the issue forward. Chairman Hasselwander noted that the NANC has used subgroups between meetings to work issues to resolution -- so far that process appears to be working well. Chairman Hasselwander also noted that the Chair should set time limits for discussion and adhere to them, as well as remind members of their responsibilities, as necessary.

With respect to the responsibilities of members, Chairman Hasselwander noted that members should be on time and should be prepared to stay until the end of the meeting. They also should be prepared to discuss the issues. Points should only be made once. Comments should be relevant and to the point. Chairman Hasselwander stated that members should strive to achieve good public policy, with agreement as the objective -- to find solutions in a fair manner. Members with strong positions should try not to surprise the group on the day of meeting but

instead should provide contributions at least a week before the meeting at which the item will be discussed. Finally, members should always be civil and courteous to each other.

With respect to the responsibilities of presenters, Chairman Hasselwander noted that material should be provided at least one week in advance of meeting, with a clear statement of the issue and any opposing positions.

Ron Binz, CPI, thanked the Chairman for bringing this to our attention to tighten up our process. Jerry O'Brien, Omnipoint, question how many NANC members must be present for a quorum and that this number should be clearly stated. Chairman Hasselwander agreed to look into the issue. Tony Pupek, USTA, suggested that each issue should have two issue managers to ensure a back-up. He also stated that one of the responsibilities of the chair should be to ensure that agenda items are appropriate for NANC's consideration.

Chairman Hasselwander agreed to revise the contribution and circulate it for review and discussion at the NANC's January meeting.

Audits of Code Holders. Discussion about NANPA OS deliverable for 1000s block for pricing. Chairman Hasselwander indicated that the NANPA OS WG is working the audit process. The question is whether or not the NANPA should be providing audits now without waiting for a set of procedures, pursuant to Commission rules at paragraph (b) of 47 CFR and consistent with industry developed guidelines and regulations.

With reference to CO Code Administration guidelines, under section 2.9, audits may be performed to: (1) ensure uniformity in application of the guidelines by a Code Administrator to all code requests received by the Code Administrator; (2) ensure consistent application of the guidelines among all Code Administrators in the event there is more than one Code Administrator; (3) ensure compliance with the guidelines by code applicants and Code Administrators; and (4) ensure the efficient and effective use of numbering resources by code applicants/holders and management of numbering resources by Code Administrators. The guidelines further note that audits are appropriate per the letter dated July 30, 1997 from the NANC Chairman to the INC Moderator. Appendix A to the guidelines describe the scope, principles, and a matrix which talks about statistically valid sample of all applicants. The Steering Group believes that the NANPA has the responsibility to carry on reasonable audits. Bill Adair, SBC, clarified that the NANPA will not perform audits until the central office code administrators functions have been transitioned to the NANPA. The NANC reached consensus on this matter to go forward and will formalize intent in a letter to the NANPA.

L. NANPA Oversight Working Group Report. Andrea Cooper, Co-Chair (by conference bridge) and Brent Struthers provided the report to the NANC. They distributed copies of a handout concerning NANPA requirements with respect to specific state requirements. Specifically, the issue is whether the NANPA has responsibility regarding services provided in the past by the CO code administrators that were specific to the state. The issue has been brought forth in the context of a practice in California in which court reporters were used at NPA relief planning public meetings and the cost of the reporters was paid by the ILEC. Although Ms. Cooper has been working this issue in California, the broader question must be considered.

Bill Adair, SBC, indicated that the issue was well-stated and that the issue is quite broad. As an example of the type of activity provided by the ILEC under its CO code administrator function, Mr. Adair reported that he holds monthly meetings to ensure that NPA relief plans are carried out and undertakes customer education programs. Vince Majkowski, NARUC, remarked that from a NARUC perspective, implementation meetings, monthly reports and customer education in a jeopardy situation are all valid areas that NARUC would view as falling within NANPA's responsibilities.

Bernie Harris, GTE, noted that in his view the problem is all encompassing. He does not believe that states should be able to impose customer education requirements on the industry as a whole. Ed Gould, AT&T, believes NANC should see a list from the NANPA of what falls under its contract. Ron Binz, CPI, added that it would be desirable to have a certain degree of uniformity. Bill Adair noted that SBC does not believe customer education is a NANPA responsibility; on the other hand, it would view the coordination of activities as a function of the CO code administrator.

Ron Conners, Lockheed Martin, provided Lockheed Martin's view on this issue. Mr. Conners stated that the Requirements Document established a firm, fixed price for the NANPA responsibilities and that it subsumed the CO code administrator guidelines. Mr. Conners reported that Lockheed Martin is currently managing 32 relief activities and has responded to more than 2000 code requests. Mr. Conners reported that what is really at issue are the functions that fall outside the boundaries; Lockheed Martin needs a bright line list of its responsibilities. Mr. Conners noted that the NANPA OS WG is developing the NANPA performance matrix, which lists all functions incorporated into the FCC Order, the Requirements Document and applicable industry guidelines for NANP administration.

Kris Monteith, FCC, noted that in the FCC's view the functions performed at the time by the 11 CO code administrators now fall within the scope of the NANPA's responsibilities. The FCC believes it was incumbent upon a respondent to have investigated what services the incumbent CO code administrators were providing in each area or jurisdiction. Ron Conners responded that Lockheed Martin had looked at what was being done in each of the states, but the functions at issue are really on the "fringe" and that there is no dispute regarding the NANPA CO Code Administration "core services." Ed Gould, AT&T, added that Lockheed Martin has the ability to provide additional state specific services on an enterprise basis. Ron Conners added that enterprise services are fair, but Lockheed Martin does not believe it is fair to burden the entire country with full fees for functions that are provided only to a specific state.

Nelson Ledbetter, Ameritech, stated that the CO Code Transition Task Force documented all the functions that were being performed by the 11 CO code administrators. These are costs that should be a shared industry function. Bernie Harris, GTE, noted that, currently, some functions performed were directly related to the CO code function and some functions were ancillary. The INC documents outline those functions that are currently performed on a national basis -- important elements are contained in the guidelines. Mr. Harris suggested that if the functions is contained within the guidelines, it should fall within the NANPA's responsibility.

Bill Adair, SBC, stated that the CO Code administration functions are defined clearly, and agreed that NPA relief functions need more focus -- there is separation between the two. With respect

to the statement made by the Kris Monteith, Mr. Adair indicated that an assumption was made that each respondent was to determine what functions were being performed by the incumbent administrators and note the differences. He indicated agreement with Ms. Monteith and stated that the industry guidelines are a minimum set of guidelines.

Ron Conners, Lockheed Martin, acknowledged that there are guidelines for NPA relief planning and that site visits were conducted after the award. The industry and NANPA jointly prepared a draft for purposes of the transition plan and accommodated the differences. Nonetheless, issues have arisen that are above and beyond the transition plan and the controlling documents, *i.e.*, the FCC's Orders, the Requirements Document and related industry guidelines.

Kris Monteith, FCC, added that indeed these issues are difficult. She reiterated, however, that all respondents had an opportunity to investigate the commitments at the time of development of their respective bid. For this reason, in all likelihood, the FCC would take a more expansive view of the responsibilities of the NANPA than had been expressed by Mr. Conners today. Chairman Hasselwander noted that the NANPA OS is putting together a performance matrix as a tool to perform an annual review of the NANPA's performance. He therefore suggested that further discussion be deferred until the NANC has an opportunity to review the matrix, a draft of which will be available by January 11, 1999. Ms. Cooper stated that she did not believe that the guidelines and the Requirements Document would answer the broader question.

Chairman Hasselwander suggested that, once the compliance matrix is available and the NANC is able to understand in more detail the requirements of the NANPA, that a small group of volunteers prepare a proposal defining state specific responsibilities. JoAnne Sanford, NARUC, volunteered Erin Duffy, NARUC, to participate. Ron Binz, Bill Adair and Brent Struthers also will assist. Chairman Hasselwander stated that the strawman proposal and this issue will be revisited at next meeting.

Brent Struthers next reviewed the handout provided on the NANPA OS WG activities. The following issues are being worked by the NANPA OS WG: the draft pooling administrator requirements, the NANPA compliance matrix, Lockheed Martin's neutrality, and state issues. Mr. Struthers reported that the draft pooling administrator requirements will be finalized and delivered to the NANC on January 11, 1999. He also reported that, at its January 6 meeting, the NANPA OS WG is scheduled to review the compliance matrix but no deadline has been set for the actual review of the NANPA's performance. With respect to the Lockheed Martin neutrality issue, Mr. Struthers reported that the NANPA OS WG is awaiting Lockheed Martin's report to the FCC, which is now due on December 18. The NANPA OS WG also is waiting the NANC decision on state-specific issues, although the California issue is the only one that remains unsettled. Mr. Struthers indicated that no response has been received from Maine and Massachusetts in reply to the NANC letters to them. Finally, Mr. Struthers reported on the meetings that the NANPA OS WG has scheduled, both face-to-face meetings and conference calls, through April 1999.

Trent Boaldin, OPASTCO, asked whether the draft pooling administrator document was on the web. Mr. Struthers and Ms. Handley, PCIA, noted that the document is on the ATIS web site. Chairman Hasselwander stated that a NANC conference call would probably be required prior to the January 19-20 face-to-face NANC meeting, because it is important that NANC weigh in on

the Lockheed Martin divestiture issue before the next full meeting. The NANC scheduled a conference call for January 7, 1999, from 1 p.m. to 4 p.m. Frontier Communications will provide the conference bridge. A public notice announcing the meeting and agenda will be released between December 18 and 21 for publication in the Federal Register no later than December 23, 1998.

Brent Struthers then reviewed the request from the NANPA Oversight Working Group for guidance from the NANC on the appropriate bid approach to be included in the 1000 block pooling administrator guidelines. The handout on this issue was reviewed. Mr. Struthers reported that the agreement had been interpreted very conservatively but there needs to be more flexibility for the pooling administrator.

Anne La Lena, Cost Recovery Working Group Co-chair, reminded the NANC that one part of the CR WG recommendation had been accepted; that is, that the NANC request a firm fixed-price proposal, with acceptance of a fixed price contingent upon the underlying cost information and assumptions provided by the NANPA. Ms. La Lena reported that this recommendation could be modified as appropriate. Ms. La Lena also stated that the CR WG will provide further recommendation when more is known about that 1000 block pooling administration. Chairman Hasselwander asked when the CR WG could be ready to undertake additional work. Ms. La Lena stated that the WG could begin immediately. She was unsure, however, as to whether the WG could complete the work by the NANC's January meeting but the work definitely would be completed by the time of the NANC's February meeting. Chairman Hasselwander also asked the CR WG to consider the issue of how a material mistake in assumptions should be handled. Brent Struthers, Illinois PUC, asked when Lockheed Martin would submit its bid. Barry Bishop indicated that Lockheed Martin would submit its bid within 30 days following receipt of the statement of work. As a consequence, it was agreed the CR WG should provide its report on this issue by the date of the February NANC meeting, not the January meeting.

M. Presentation by Lockheed Martin (LM). Jeffrey E. Ganek, Senior VP and Managing Director, Communications Industry Services (CIS), provided an update on Lockheed Martin's divestiture of the CIS unit. Mr. Ganek reported that progress has been made on this issue since August. Lockheed Martin and CIS have moved very quickly in response to concerns raised about Lockheed Martin's entry into the network services business. Lockheed Martin has reached agreement in principle with a purchaser; contracts have been signed and the legal and administrative details are being worked out. Mr. Ganek reported that the new structure provides for complete competitive neutrality of the CIS unit. Mr. Ganek reported that the new unit will provide the same services on the same terms. Mr. Ganek also reported that it is the intent of Lockheed Martin to provide for a seamless and invisible transition to the new CIS. Mr. Ganek also reported that the whole restructuring is contingent upon approval by the FCC, the LLCs, the NANC and the other members of the NANP. Mr. Ganek expressed the view that all questions and concerns will be addressed by the Lockheed Martin filing. Finally, Mr. Ganek stated that Lockheed Martin expects to make its filing with the FCC, describing the new CIS, as soon as possible.

N. Presentation by Mitretek Systems. Frank Ferrante, Mitretek, provided the NANC members with a handout setting forth Mitretek's position on the neutrality issue and reiterated that position for the benefit of the members. In general, Mr. Ferrante stated that Mitretek

believes that the FCC should transfer the NANPA responsibility to it, as the alternate NANPA. Mitretek believes that Lockheed Martin has violated the neutrality criteria and that this violation cannot be cured by the sale of the CIS unit. Mr. Ferrante stated that Mitretek is willing and able to assume the NANPA responsibilities.

Anne La Lena, MCI WorldCom, asked Lockheed Martin how much detail would be provided in the Lockheed Martin filing with the FCC. Mr. Ganek reported that all of the appropriate issues would be addressed and that the filing would answer questions as necessary. Mr. Ganek indicated that Lockheed Martin has conducted an extensive investigation of the acquiring entity; the filing contains a great deal of information and additional detail will be provided as necessary. Brent asked whether the current pending state-related contractual issues and any other commitments to date would be assumed by the new entity without delay. Mr. Ganek stated that contract is very clear on this point -- the new CIS must step into the shoes of Lockheed Martin. Thus, it must provide the same services, under same terms and conditions and at the same price.

Cathy Handley, PCIA, asked whether the state specific issues resolved before final approval of the divestiture would be supported by the new entity. Mr. Ganek stated that the new body would categorically support resolutions reached by the NANC. Mr. Ganek stated that the NANC would resolve those issues in good faith with the NANC, transition or not. Tony Pupek, USTA, asked what safeguards to ensure the neutrality of the NANPA would be in place for the CIS unit during the interim approval process. Mr. Ganek further added that Lockheed Martin understands that they are managing a very sensitive and critical resource. The proposed acquiring entity will not be involved in the telecommunications business and CIS will remain segregated during this process, so that there are no operational violations.

Peter Guggina asked Mitretek whether it would be willing to assume the NANPA functions at the fixed price committed to by Lockheed Martin. Mr. Ferrante stated that Mitretek had not proposed the same level of effort as Lockheed Martin; therefore, it would not be willing to assume the NANPA function at the Lockheed price.

O. Other Business. No other business was considered by the NANC.

VI. Decisions Reached and Action Items:

1. LNPA Working Group. Final NANC Report on Wireline Wireless Integration will be completed by June 1999. In the interim, updates to the process and procedures will be posted on FCC web site and/or Chairman Hasselwander's web page. LNPA WG will provide updates on final report progress on a monthly basis to NANC.

2. INC Project on 500/900 Portability. Target final report to NANC by October 1, 1999. Chairman Hasselwander will provide letter to the INC advising of target date. With regard to expanding participation on this INC activity, the INC will keep NANC informed concerning the conference bridge experience/disposition.

3. NANC to NRO WG Regarding COCUS/LINUS Workplan. NANC consensus reached on the obligation of service providers (all users of the numbering resource) to report utilization and forecast data to the NANPA. The workplan must consider costs to service providers, including

cost to produce data in response to a newly adopted model, and the cost to deliver the new model product. The NRO WG report will be in sufficient detail to be implementable in practice; this includes guidelines and methods. The NRO will report monthly results and get feedback at each NANC meeting to test agreements on results presented. Questions that cannot be answered at the NRO WG (e.g., policy disputes) should be referred promptly to the NANC. The NANPA OS WG is currently working the COCUS/LINUS audit issue. Assumptions: NANC has reaffirmed commitment to confidentiality on collection of data. Telephone number status, such as reserved numbers, must be included as part of utilization data collection. The deadline for a finalized product to be forwarded to the FCC is June 1999. The June 1999 deliverable date is subject to review by the NRO WG.

4. Reserved Numbers. Assignment to NRO WG is to describe *characteristics* of a reserved number -- the result must be consistent with ease of ordering; must not be a barrier to porting; number reservation must not be used for the purpose of hoarding numbers; must observe four points of agreement affirmed at NANC on December 16, as follows: (1) a reserved number must be requested by a customer; (2) numbers being reserved are reflected in the service provider's records; (3) the requesting party's name must be in the service provider's record, and (4) the end user must be aware of the reservation. Additionally, NRO should keep in mind that there needs to be flexibility in order to address the needs of small and large service providers alike. NRO will work the issue and bring a response to NANC at the February 1999 NANC meeting. NANC will revisit words "legally enforceable written agreement."

5. BETA Systems. Chairman Hasselwander will write letter to Professor Levine which will state that NANC will await the deliberations of T1S1 and revisit the proposal, if appropriate.

6. NANC Homework Assignment. Identify 2 or 3 numbering issues on which we wish we had "consumer preference" information and send to Chairman Hasselwander. If known, members should identify data sources and include that information in their statement. Chairman Hasselwander will collect and compile the results and send to the full NANC.

7. Steering Group Report. NANC agreed to adopt the "NANC Working Group Operating Principles" as revised. NANC Chair will distribute copy of the revised principles to all NANC Working Group Co-Chairs with a recommendation that they are reviewed with all working group participants. The revised Principles will be placed on the FCC NANC web page as well as the Chairman Hasselwander's web page.

NANC Chair will revise methods list for meeting efficiencies, per comments made during discussion, and will distribute to members for discussion at January NANC meeting.

NANC agreed to begin an audit process of code holders and applicants. NANC chair will formulate a letter to the NANPA that communicates the NANC's request to begin audits. NANPA will be requested to propose methods, procedures, scope and frequency of audits. NANC request should reference code guidelines. NANC will review NANPA proposal at January meeting and make a decision at the NANC January meeting.

8. NANPA Oversight WG. A NANC Issue Management Team, consisting of Ron Binz, Erin Duffy, Bill Adair and Brent Struthers, will frame the issue regarding the NANPA requirements

pertaining to functions to be performed as the CO Code Administrator. The primary areas of concern are related to NPA relief activities. The NANPA OS WG's NANPA performance matrix will be provided to NANC members electronically by January 11 to use as a tool for further discussion at the January 19-20, 1999, NANC meeting.

NANC will hold a conference call on January 7, 1999, to discuss the Lockheed Martin neutrality issue. The call will begin at 1:00 p.m. EST, and will be scheduled to last until 4:00 p.m. A bridge number will be provided by Frontier Communications.

NANC requests the Cost Recovery Working Group (CR WG) to re-examine its previous recommendation for a firm fixed price for the 1000 block pooling administration function, with a focus on the need for addressing variable costs, (e.g., based on block implementation) and changes in requirements during the contract term as part of a revised recommendation. CR WG will provide information at the February 17-18, 1999, NANC meeting.